

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**THE LUTHERAN CHURCH – MISSOURI  
SYNOD, a Missouri nonprofit corporation  
Plaintiff,**

**V.**

**DONALD CHRISTIAN, CHRISTOPHER  
BANNWOLF, CONCORDIA  
UNIVERSITY TEXAS, INC., & JOHN  
DOES 1-12**  
*Defendants*

**Case No. 1:23-cv-1042-DAE**  
**[Consolidated with 1:24-cv-00176-DAE]**

## DECLARATION OF DANIEL R. RICHARDS

I, Daniel R. Richards, declare and state as follows:

1. I am lead counsel representing Defendant Concordia University Texas, Inc. (“CTX”) in the above captioned case. I am over 18 years of age, of sound mind, and capable of making this declaration. I make this declaration in support of CTX’s Response to a Motion to Compel filed by Plaintiff Lutheran Church – Missouri Synod, a Missouri nonprofit corporation (“LCMS”). The facts stated herein are based upon my own personal knowledge and are true and correct.

2. I was served with LCMS's First Requests for Production and Interrogatories on July 12, 2024. The Requests for Production include 46 separate requests that seek documents and correspondence that would be in the possession of both current and former members of CTX's Board of Regents, and CTX's officers and leadership team.

3. On July 18, 2024, attorneys and staff assigned to this case met with Defendants Donald Christian and Christopher Bannwolf, CTX's then provost Kristi Kirk, and the current President of CTX's Board of Regents Stephen Sohns to discuss the discovery requests and collection of emails and other documents which may be responsive to the requests.

4. Recognizing the volume of electronically stored material which may be responsive to LCMS's requests, my firm signed a contract on July 23rd with CS Disco, Inc. ("Disco"), an ediscovery online platform designed to aid litigators to review and produce voluminous discovery responses. The contract provided for Disco staff support in retrieving e-mails from the various custodians of potentially responsive documents and creating a database of the documents.

5. On July 24th, Defendant Donald Christian emailed all current and former Regents and members of CTX's leadership team from 2021 to present regarding the collection of emails. On July 25th, I sent a letter to all current and former members of CTX's Board of Regents from 2021 to present asking that they allow Disco to contact them and facilitate the collection of emails from any email address from which CTX business was conducted. A copy of that letter is included as **Richards-A<sup>1</sup>**. We were able to collect documents from 17 current and former members of CTX's Board of Regents and from 17 CTX officers and members of CTX's leadership team. All members of CTX's Board of Regents are unpaid volunteers, who utilize their personal and work email addresses to conduct CTX business. Because of this, we had to work with each individual regent to obtain access to their email accounts to collect potentially responsive emails and attachments.

6. We collected our first batch of emails on July 29th and the last batch of emails on August 16th. In this time period, we collected 2,474,472 individual documents which may be responsive to LCMS's RFPs. I informed LCMS of this in correspondence with their counsel on September 20, 2024. A copy of this correspondence was included in LCMS's Motion to Compel as Exhibit 6.

7. After collecting these documents, we utilized several methods to minimize the number of documents needing individual review, thus minimizing the timeframe of production. First, we

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<sup>1</sup> This letter is being produced for the purposes discussed in this response. No attorney-client advice was given with this communication. Its production is solely for the purposes discussed in this response and is not a waiver of the attorney-client privilege.

removed all documents that did not contain any of the following terms: (a) Amend; (b) Bylaws; (c) Charter; (d) Articles of Incorporation; (e) articles; (f) Policy Manual; (g) governance; (h) align; (i) affirm; (j) seat; (k) new board; (l) nominate; and (m) elect. Then we worked to mass remove documents which contained the search terms but were likely unresponsive. Because we collected all emails that current and former Regents, CTX officers, and CTX leadership had sent or received since 2021, our initial collection included documents from 2,619 individual email domain addresses. We reviewed sample emails from each of these email domain addresses and removed all documents from over 450 domain names that were likely to be junk emails. For instance, all emails from the domain address “e.menswearhouse.com” were flagged as “likely junk” and removed from active review. This review concluded on October 2nd and reduced the number of documents that required individual review to just over 110,000 documents. We then worked with Disco to remove all exact duplicates from the remaining documents and further reduced the number of documents which require individual review to 91,029.

8. We currently have 2 attorneys and 3 staff actively reviewing the remaining documents in the database for responsiveness. At the time of this filing, they have reviewed 26,069 documents. Many of the individuals whose emails contain responsive materials sit on various boards, some related to CTX and some not. Careful review of these emails is necessary to ensure that the materials gathered for production are actually responsive to LCMS’s requests and are not disclosing material related to the governance of other organizations whose boards CTX Regents and staff voluntarily sit on. In addition, several of the emails contain sensitive student information protected by the Federal Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPAA).

9. Continued demands by LCMS of court intervention in this case's discovery process have slowed CTX's ability to review and produce responsive documents, as well as the privilege logs which LCMS seeks. In order to gather the facts presented in this declaration and prepare the response to LCMS's motion to compel, the primary attorney and staff person responsible for reviewing documents in the Disco database had to stop their review efforts and turn their attention to this response. Similarly, the primary attorney responsible for document review was required to stop review efforts to prepare CTX's supporting reply for the motion for protective order regarding LCMS's third-party subpoenas which sought many of the same documents that CTX has likely gathered from other Regents. Had LCMS agreed to CTX's proposed protective order attached to CTX's motion, which included the remedy proposed by LCMS in its response brief, that attorney's time would have been spent on document review.

10. CTX has also already produced several thousands of pages of documents to LCMS. On June 12<sup>th</sup>, CTX produced 779 pages of documents to LCMS. On August 12<sup>th</sup>, CTX produced over 5,000 pages of responsive documents. On September 10<sup>th</sup>, CTX produced another 135 pages of responsive materials. And finally, on October 24<sup>th</sup>, CTX produced more than 1,000 pages of responsive material, totaling 8,355 pages of relevant and responsive materials produced thus far. Attached as **Richards-B** is a true and correct copy of CTX's production log which provides the Bates-stamp numbers of the documents, a description of the document, and the date of production.

11. The October 24<sup>th</sup> production includes Board of Regents meeting agendas and notes, and other back-up documents related to board meetings, as well as an initial privilege log. Attached as **Richards-C** is a true and correct copy of CTX's privilege log served on LCMS on October 24<sup>th</sup>. These documents were gathered from CTX's internal databases and information sharing platforms. The search for and collection of these documents happened outside of, and in addition to, the email

search process described previously in this declaration. Collection of these documents began on July 19<sup>th</sup>. We collected approximately 350 documents, including Board of Regents packets from 2016 through 2022 which are between 100 and 300 pages long and contain a variety of privileged and confidential material. Review of the documents for responsiveness began on July 24<sup>th</sup>. In addition, the documents were reviewed for privileges, privileged and confidential information was redacted, and a privilege log was prepared.

12. As of October 23<sup>rd</sup>, attorneys and staff at the firm have spent a total of 312 hours preparing responses to LCMS's requests and collecting and reviewing documents responsive to LCMS's requests. Attached as **Richards-D** is a true and correct copy of the hours logged by firm attorneys and staff on responding to LCMS's requests to CTX. These hours do not include time spent addressing LCMS's Third-Party Subpoenas or responding to LCMS's discovery requests of Defendants Christian and Bannwolf.

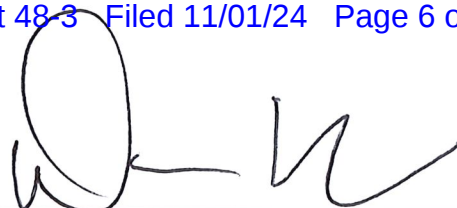
13. In addition, as of October 23<sup>rd</sup>, CTX has spent over \$25,000.00 on e-discovery support from Disco to collect, process, and filter documents responsive to LCMS's requests. This does not include the costs to ingest or store these documents in Disco's database. Attached as **Richards-E**, **Richards-F**, and **Richards-G** are true and correct copies of invoices from Disco for work on this case. The highlighted portions are those related to collecting, processing, and filtering responsive documents.

14. CTX will continue to supplement its discovery responses and its privilege log as it is able to complete review of the remaining responsive documents.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 29, 2024.

By:

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a horizontal line and a cursive 'R'.

Daniel R. Richards



**DAN RICHARDS**  
PARTNER

July 25, 2024

Current and Former Members of  
Concordia University Texas ("CTX") Board of Regents

Re: Cause No. 1:23-cv-1042; *The Lutheran Church-Missouri Synod v. Concordia University Texas, Donald Christian and Christopher Bannwolf and John Does 1-12*;  
In the U.S. District Court for the Western District of Texas, Austin Division

**Attorney Client Confidential Communication**

Dear Current and Former Members of CTX Board of Regents,

I am sure you are aware that a lawsuit was filed by the Lutheran Church – Missouri Synod ("LCMS") against CTX and others related to the Board decision on November 8, 2022 to amend the University's charter, bylaws, and policy manual. I am counsel for CTX as well as the additional named defendants. As a result of the lawsuit, CTX has been served by the LCMS with requests for documents. These requests ask for, among other things, communications between Board members and others discussing the various amendments. In an effort to properly respond to the requests, we have retained CS DISCO, Inc. ("DISCO") to facilitate the compilation of requested email communications between each of you in this regard.

We would like the opportunity to have DISCO contact you and facilitate the collection of emails from any email address you use to communicate CTX business. DISCO will collect all emails between the dates ***January 1, 2021 to the present***. The data collected will then be searched using the ***List of Search Terms*** attached to this correspondence.

My staff will review the search results and remove any unrelated communications as well as identify any attorney-client privileged communications. The remaining emails will be numbered and produced in response to the requests propounded by counsel for LCMS.

I know this process is intrusive and am available to answer any questions you may have. My direct phone number is 512-391-8223.

Sincerely,

**Richards Rodriguez & Skeith, LLP**

*/s/ Daniel R. Richards*

Daniel R. Richards

July 25, 2024

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cc: Donald Christian  
Christopher Bannwolf  
Stephen Sohns  
Kristi Kirk



**SEARCH TERMS**

Amend  
Bylaws  
Charter  
“Articles of Incorporation”  
articles  
“Policy Manual”  
Governance  
Align  
Affirm  
  
Seat  
“new board”  
Nominate  
Elect

**Exhibit B to Declaration of Daniel R. Richards****DEFENDANTS'****Page 1 of 8****DOCUMENT PRODUCTION**

Confidential	Bates Number	Description	Date	Date Produced
	CTX_000001-	Certificate Concordia Lutheran College to Adopt the "Concordia Welfare Plan for Ministers of Religion and Lay Workers of the LCMS, its Member Congregations, Controlled Organizations and Affiliated Agencies"	2/12/1969	6/12/2024
	CTX_000002-00003	LCMS - Joinder Agreement to Continue as a Participating Employer in the Concordia Plans; effective 1/1/2006	10/6/2005	6/12/2024
<b>REAL ESTATE (RFP 20)</b>				
	CTX_000004-00011	Agreement of Covenants Conditions and Restrictions Lots2-4; (USL Reserver to CTX)	3/30/2007	6/12/2024
	CTX_000012-00017	Special Warranty Deed USL Reserve, LP to Concordia University at Austin	3/30/2007	6/12/2024
	CTX_000018-	Resolution (COM no confidence memo to CUS)	4/26/2013	6/12/2024
				6/12/2024
	CTX_000019-000127	Concordia Retirement Plan 2021 -Restatement Plan Document	12/1/2022	6/12/2024
<b>COMMUNICATIONS BETWEEN CTX AND LCMS; CTX &amp; CONSTITUENTS (INITIAL DISCLOSURES; RFP 12)</b>				
	CTX_000128-000154	7-03 Proposal for LCMS review and comment	2/19/2021	6/12/2024
	CTX_000155-000157	CTX (C Bannwolf/D Christian) letter to LCMS BOD re Governance Discussion	2/15/2022	6/12/2024
	CTX_000158-000160	LCMS (Rev. Kumm) letter to CTX BOR, C Bannwolf/D Christian response to 2/15/2022 letter	2/25/2022	6/12/2024
	CTX_000161-	Concordia Plans- Changes Letter	3/15/2022	6/12/2024
	CTX_000162-000163	CTX (C Bannwolf/D Christian) letter to LCMS responding to 2/25/2022 letter	3/22/2022	6/12/2024
	CTX_000164-000166	LCMS (Rev. Harrison) letter to Don Christian	3/31/2022	6/12/2024
	CTX_000167-000169	LCMS (Rev. Harrison) letter to Don Christian (DUPE)	3/31/2022	6/12/2024
	CTX_000170-000171	LCMS (Rev. Kumm) Ltr to CTX/CBannwolf and D Christian re response to 3/22/22 letter	3/31/2022	6/12/2024
	CTX_000172-	LCMS (Rev. Kumm) letter to Don Christian response to 4/21/22 email	4/26/2022	6/12/2024
	CTX_000173-000174	LCMS (Rev. Kumm) letter to CTX BOR & D. Christian re bylaw procedures for a proposal to separate	6/2/2022	6/12/2024
	CTX_000175-	CTX (D Christian) Memo re BOR Governance Conversation	6/6/2022	6/12/2024
	CTX_000176-000188	Reimagining the Relationship: A proposal from Concordia University Texas to separate from LCMS governance (CTX Separation Proposal)	7/19/2022	6/12/2024
	CTX_000189-000244	Resolutions of the Board of Regents of CTX (to Disaffiliate and Exhibits 2022-11-08)	11/8/2022	6/12/2024
	CTX_000245-000246	CTX Memo to CTX Constituents re An Important Announcement Regarding BOR	11/8/2022	6/12/2024
	CTX_000247-000248	CTX (D Christian) email to Past CTX BOR re Governance Decision Announcement	11/9/2022	6/12/2024
	CTX_000249-	CTX (D Christian) Memo to CTX Friends and Constituents re BOR Governance Conversation	11/8/2022	6/12/2024
	CTX_000250-000251	LCMS (Rev. Harrison/Rev. Kumm) letter to CTX BOR/D. Christian re CTX governance	11/11/2022	6/12/2024
	CTX_000252-000258	CUS (Rev. Dean Wenthe) letter to CTX re Nov 8th actions taken	11/12/2022	6/12/2024
	CTX_000259-	LCMS (Rev. Harrison/Rev. Kumm) letter to CTX BOR re letter of 11/11/22	12/2/2022	6/12/2024
	CTX_000260-000261	LCMS (Rev. Harrison/Rev. Kumm) letter to CTX BOR re 11/11/22	12/8/2022	6/12/2024
	CTX_000262-	CTX (C Bannwolf) letter to LCMS (Rev. Harrison/Kumm) re follow up to 12/5/22 letter	12/15/2022	6/12/2024
	CTX_000263-	LCMS (Rev. Harrison/Rev. Kumm) letter to C Bannwolf response to 12/15/22 letter	12/21/2022	6/12/2024
	CTX_000264-	CTX (C Bannwolf) letter to LCMS (Rev. Harrison/Kumm) re response to 12/21/22 letter	12/23/2022	6/12/2024
	CTX_000265-	LCMS (Rev. Harrison/Rev. Kumm) letter to CTX (C Bannwolf), BOR response to 12/23/22 letter	12/30/2022	6/12/2024
	CTX_000266-000268	7-03 Resolution 2023 LCMS Convention-	00/00/2023	6/12/2024
	CTX_000269-000270	CTX (C Bannwolf) letter to LCMS (Rev. Harrison/Kumm) re follow up to 12/30/22 letter	1/3/2023	6/12/2024

**Exhibit B to Declaration of Daniel R. Richards**  
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**DEFENDANTS'**  
**DOCUMENT PRODUCTION**

Confidential	Bates Number	Description	Date	Date Produced
	CTX_000271-000273	LCMS (Rev. Harrison/Rev. Kumm) letter to C Bannwolf, BOR response to 1/3/23 letter	1/5/2023	6/12/2024
	CTX_000274-000288	CTX Report FINAL_LCMS President's Report on the Ecclesiastical Visitation of CTX	1/6/2023	6/12/2024
Confidential	CTX_000289-000294	CUS BOD Austin Presentation as Presented Jan 12, 2023	1/12/2023	6/12/2024
	CTX_000295-	LCMS BOD letter to CTX BOR re Jan 12, 2023 gathering	1/20/2023	6/12/2024
	CTX_000296-	CUS Board Resolution for CTX to recind its action to separate from Synod Governance	2/9/2023	6/12/2024
	CTX_000297-	LCMS BOD Notice of Action to CTX BOR re: Synod BOD Resolution Calling on CTX to Reverse and Return	2/9/2023	6/12/2024
	CTX_000298-000299	CTX (D Christian) Memo to CTX Friends and Constituents re CTX Governance updated 2.21.23	2/14/2023	6/12/2024
	CTX_000300-000301	LCMS (Chairman Dr. George Gude) letter to CCM re 11/8/22 actions taken by CTX	2/20/2023	6/12/2024
	CTX_000302-000303	CUS (Dr. Gerhard H. Mundinger, Jr) letter to C Bannwolf request for CTX to rescind its action on 11/8/22	2/20/2023	6/12/2024
	CTX_000304-000308	CTX (D Christian) Letter response to LCMS President's Report on the Ecclesiastical Visitation of CTX	2/22/2023	6/12/2024
	CTX_000309-000310	Concordia Plans letter re Concordia retirement withdrawal and estimate	3/27/2023	6/12/2024
	CTX_000311-000313	LCMS (Rev. Harrison/Rev. Kumm) letter to CTX BOR re BOD Resolution CTX/BOR are subject to Synod's bylaws	3/28/2023	6/12/2024
	CTX_000314-	CTX (D Christian) Memo to CTX students, faculty, staff, alums, and community members re Update on Governance Structure	4/4/2023	6/12/2024
	CTX_000315-000318	CTX (D Christian) Memo to CTX Stakeholders re Response to the Ecclesiastical Visitation Report from President Matthew Harrison of the LCMS	4/21/2023	6/12/2024
	CTX_000319-000329	LCMS (Paul Philip) email re LCMS Notice of CUS BOD Resolution	5/8/2023	6/12/2024
	CTX_000330-000339	LCMS (Rev. Kumm) letter to CTX BOR demanding that CTX BOR correct its 11/8/22 and 4/4/23 decisions	5/9/2023	6/12/2024
	CTX_000340-000341	CTX (C Bannwold) letter to LCMS (Rev. Kumm) response to 5/9/23 letter	5/17/2023	6/12/2024
	CTX_000342-	CTX (D. Christian) letter to LCMS (Rev. Harrison/Rev. Kumm) acknowledge CTX as self-governed and to work collaboratively on an agreed resolution of separation	6/16/2023	6/12/2024
	CTX_000343-000355	LCMS (Rev. Kumm/BM Andrew Grams) letter to CTX BOR response to letter 6/16/23	6/28/2023	6/12/2024
	CTX_000356-000357	CTX BOR letter to CUS and LCMS BOD (CTX/LCMS to reach resolution)	7/14/2023	6/12/2024
	CTX_000358-000359	CUS (Dr. Gerhard H Mundinger, Jr./Rev. Dean Wenthe) to CTX BOR response to 7/14/23 letter	7/25/2023	6/12/2024
	CTX_000360-000362	LCMS (Rev. Harrison) email to CTX response to Reconciliation Ltr	7/25/2023	6/12/2024
	CTX_000363-000364	LCMS (BM Christian Presu/BM Andrew Gams) letter to CTX BOR re election of 4 regents to CTX BOR (Rev. Nathaniel Hill, Miguel Ruiz, Bob Ssekyanzi, Bill Brandt)	8/8/2023	6/12/2024
	CTX_000365-000370	LCMS (Sec. John W Sias) Notification of Elections Letter to CTX (C Bannwolf/D Christian)	8/28/2023	6/12/2024
	CTX_000371-	CTX (C Bannwold) letter to LCMS (C Preus/A Grams) response to 8/8/23 letter	8/30/2023	6/12/2024
	CTX_000372-000373	CTX (D Christian) Memo to CTX Stakeholders re CTX Seeks Next Steps with LCMS	8/30/2023	6/12/2024
	CTX_000374-	CTX (D Christian) Memo to CTX Stakeholders re CTX Response to LCMS Lawsuit	9/5/2023	6/12/2024
	CTX_000375-000377	Concordia Plans re Notice of Withdrawal	5/23/2024	6/12/2024
	CTX_000378-	CTX SOS Cert of Amendment filed 5.2.2022 - Amend Purpose Clause for 501c3	5/2/2022	6/12/2024

**Exhibit B to Declaration of Daniel R. Richards**  
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**DOCUMENT PRODUCTION**

Confidential	Bates Number	Description	Date	Date Produced
	CTX_000382-000386	CTX SOS Certified Copy of 11.8.2022 Cert Amendment	11/8/2022	6/12/2024
	CTX_000387-000408	CTX Certified Copies of Filings with the SOS		6/12/2024
	CTX_000409-000413	EX 01 CTX Charter (1950)	5/3/1950	6/12/2024
	CTX_000414-000595	EX 02 Synod Bylaws		6/12/2024
	CTX_000596-000605	EX 03 Synod Constitution		6/12/2024
	CTX_000606-000608	EX 04 Amended and Restated Articles of Incorporation		6/12/2024
	CTX_000609-000730	EX 05 LCMS-Board-of-Directors-Policy-Manual (April 2023)		6/12/2024
	CTX_000731-	EX 06 Synod Resolution 4-04		6/12/2024
	CTX_000732-000761	EX 07 Tucker v. Faith Bible Chapel Int'l. amicus motion		6/12/2024
<b>CTX INSURANCE POLICY (Initial Disclosures)</b>				
	CTX_000762-000779	CTX Hanover Insurance Educator Liability Policy 22-23	7/1/2022	6/12/2024
<b>BOARD OF REGENTS MEETINGS 2016 (RFP 1-4; 28)</b>				
	CTX_000780-	2016-0219 Board welcome memo for February meeting	2/8/2016	8/12/2024
	CTX_000781-	2016-0219 CTX Executive Minutes 11-6-15		8/12/2024
	CTX_000782	2016-0219 CTX Meeting Minutes 11-6-15.pdf		8/12/2024
	CTX_000785	2016-0219 External Relations Slide BOR.pptx		8/12/2024
	CTX_000786	2016-0219 Interactive agenda v1.pdf		8/12/2024
	CTX_000911	2016-0219 Table by Electors ver2-2016.pdf		8/12/2024
	CTX_000912	2016-0219 Travel Expense Voucher 2016.pdf		8/12/2024
	CTX_000913	2016-0429 3.2.docx		8/12/2024
	CTX_000915	2016-0429 BOR Meeting Evaluation - Feb 2016.pdf		8/12/2024
	CTX_000916	2016-0429 CTX Executive Minutes 2-19-16 Final.pdf		8/12/2024
	CTX_000917	2016-0429 CTX Meeting Minutes 2-19-16_Final.pdf		8/12/2024
	CTX_000922	2016-0429 Final agenda with attachments v4.pdf		8/12/2024
	CTX_000987	2016-0429 Strategic Plan Initiatives for Year 1.pptx		8/12/2024
	CTX_000995	2016-0909 AGB Fiduciary Duties Document(1).pdf		8/12/2024
	CTX_001011	2016-0909 BOR List and Addresses 2016-2017.pdf		8/12/2024
	CTX_001014	2016-0909 CTX BOR Policy Manual - redlined April 2016.docx		8/12/2024
	CTX_001051	2016-0909 CTX Meeting Minutes 9-9-16 minus exec session.docx		8/12/2024
	CTX_001056	2016-0909 Interactive Agenda v3.pdf		8/12/2024
	CTX_001175	2016-1104 Meeting Agenda.pdf		8/12/2024
<b>BOARD OF REGENTS MEETINGS 2017 (RFP 1-4; 28)</b>				
	CTX_001391	2017-0210 Board of Regents Meeting Evaluation 2.10.17.pdf		8/12/2024
	CTX_001392	2017-0210 BOR Agenda February 2017-(2.9.17).pdf		8/12/2024
	CTX_001490	2017-0210 CTX Meeting Minutes 11-4-16 Concordia University Texas Board.docx		8/12/2024
	CTX_001494	2017-0210 ICUT_Concordia_FINAL_Jan2017.pptx		8/12/2024
	CTX_001516	2017-0428 2017 April Officer Election Ballot_Compiled Results.pdf		8/12/2024

**Exhibit B to Declaration of Daniel R. Richards**  
**Page 4 of 8****DEFENDANTS'**  
**DOCUMENT PRODUCTION**

Confidential	Bates Number	Description	Date	Date Produced
	CTX_001532	2017-0428 CTX Board Agenda april 27-28 2017 v3.pdf		8/12/2024
	CTX_001752-	2017-0428 CTX Meeting Minutes 2-10-17 CTX amended April.docx		8/12/2024
	CTX_001758-	2017-0908 CTX Board Agenda sept 7-8 2017 v 3- interactive.pdf		8/12/2024
	CTX_001995-	2017-0908 CTX Meeting Minutes 4-28-17 final edit 9-10.pdf		8/12/2024
	CTX_002003-	2017-0908 Evaluation Tally.pdf		8/12/2024
	CTX_002004-	2017-1103 Assessing academics.pptx		8/12/2024
	CTX_002019-	2017-1103 Auditor report - CTX Board Meeting 2017.pdf		8/12/2024
	CTX_002031-	2017-1103 Board Report Academic Programs.pptx		8/12/2024
	CTX_002051-	2017-1103 BOR-Partnerships.pptx		8/12/2024
	CTX_002058-	2017-1103 Disruption in Higher Education.pptx		8/12/2024
	CTX_002068-	2017-1103 CTX Board Agenda w Meeting Minutes_Nov2017v.3 .pdf		8/12/2024
	CTX_002332-	2017-1103 Evaluation Tally-2017-11.pdf		8/12/2024
	CTX_002333-	2017-1103 JS NEW_Planning for 2030 - Presentation to CTX Faculty 11-2-17_.pptx		8/12/2024
<b>BOARD OF REGENTS MEETINGS 2018 (RFP 1-4; 28)</b>				
	CTX_002361-	2018-0209 BOR Agenda February 2018 v.3 02.06.18.pdf		8/12/2024
	CTX_002647-	2018-0209 BOR Survey 2018-02-01.pdf		8/12/2024
	CTX_002658-	2018-0209 CTX Meeting Minutes 11-3-17.pdf		8/12/2024
	CTX_002662-	2018-0209 Evaluation Tally-2018-02.pdf		8/12/2024
	CTX_002664-	2018-0427 BOR Agenda April 2018-v.3.pdf		8/12/2024
	CTX_002930-	2018-0427 Evaluation Tally-2018-04.pdf		8/12/2024
	CTX_002932-	2018-0907 Board Agenda-09.07.18 v.3.pdf		8/12/2024
	CTX_003177-	2018-0907 Board Presentation 090618.pptx		8/12/2024
	CTX_003199-	2018-1109 CTX Board Agenda november 8-9 2018 v.3(1).pdf		8/12/2024
<b>BOARD OF REGENTS MEETINGS 2019 (RFP 1-4; 28)</b>				
	CTX_003466-	2019-0208 2019_Future Board Needs.docx		8/12/2024
	CTX_003467-	2019-0208 CTX Board Agenda w Meeting Minutes_Feb8 2019 v.3(1).pdf		8/12/2024
	CTX_003616-	2019-0208 CTX Full-Strategic-Plan-w-Progress-for-FY19-02082019(1).pdf		8/12/2024
	CTX_003635-	2019-0426 BOR Travel Expense Reimbursement(1).pdf		8/12/2024
	CTX_003636-	2019-0426 CTX Board Agenda w Meeting Minutes_Apr262019v.3.pdf		8/12/2024
	CTX_003779-	2019-0426 Exec Limitations Compliance Report_4.5 HR limitations.pdf		8/12/2024
	CTX_003860-	2019-0426 Exec Limitations Compliance Report_4.7 Property & Facilities.pdf		8/12/2024
	CTX_004170-	2019-0426 Exec Limitations Compliance Report_4.8 Mgmt Policies & Procedures.pdf		8/12/2024
	CTX_004301-	2019-0906 CTX Board Agenda w Meeting Minutes_Sept62019v.3(1).pdf		8/12/2024
	CTX_004511-	2019-0906 Landscape of Higher Ed - 2019.pptx		8/12/2024
	CTX_004538-	2019-1108 Audit Report_Concordia University Texas-Draft 10.31.19.pdf		8/12/2024
	CTX_004579-	2019-1108 Auditor presentation - Nov 2019.pdf		8/12/2024
	CTX_004592-	2019-1108 BOR List and Addresses 2019-2020(2).pdf		8/12/2024
	CTX_004596-	2019-1108 BOR Travel Expense Reimbursement(3).pdf		8/12/2024

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**DEFENDANTS'**  
**DOCUMENT PRODUCTION**

Confidential	Bates Number	Description	Date	Date Produced
	CTX_004597-	2019-1108 Concordia Board Session - Nov 7 - final.pdf		8/12/2024
	CTX_004626-	2019-1108 CTX Board Agenda w Meeting Minutes_Nov7-8 2019 v. 3.pdf		8/12/2024
	CTX_004908-	2019-1108 CUS info Nov 2019.pptx		8/12/2024
	CTX_004909-	2019-1108 Kouri presentation Nov 2019.pptx		8/12/2024
	CTX_004939-	2019-1108 Philanthropy presentation Nov 2019.pptx		8/12/2024
<b>BOARD OF REGENTS MEETINGS 2020 (RFP 1-4; 28)</b>				
	CTX_004950-	2020-0207 2020.01.24 Conceptual Layout and Renderings.pdf		8/12/2024
	CTX_004964-	2020-0207 Board Presentation Feb2020.pptx		8/12/2024
	CTX_005014-	2019-1108 BoR Meeting Evaluation Form(2).pdf;2020-0207 BoR Meeting Evaluation Form(3).pdf		8/12/2024
	CTX_005015-	2020-0207 BOR Travel Expense Reimbursement(6).pdf		8/12/2024
	CTX_005016-	2020-0207 CTX Board Agenda w Meeting Minutes_Feb72020_v. 3.pdf		8/12/2024
	CTX_005238-	2020-0207 CTX.2020.01.23.DesignConceptUpdate.pdf		8/12/2024
	CTX_005245-	2021-0416 Feb 2020 - Debt Financing Overview.pptx		8/12/2024
	CTX_005251-	2020 Feb StrategicPlan.pdf		8/12/2024
	CTX_005255-	2020-0529 990 2019 - Concordia Texas(1).pdf		8/12/2024
	CTX_005327-	2020-0529 CTX Board Agenda may 29 2020 v. 1(1).pdf		8/12/2024
	CTX_005358-	2020-0529 CTX Board of Regents 5-29-2020.pptx		8/12/2024
	CTX_005390-	oleObject1.bin.pdf		8/12/2024
	CTX_005391-	oleObject2.bin.pdf		8/12/2024
	CTX_005392-	2020-0731 9.b - CUS BOARDS OF REGENTS FINAL REPORT 02 (1).pdf		8/12/2024
	CTX_005585-	2020-0731 Board of Regents Board Member Ballot Survey.pdf		8/12/2024
	CTX_005587-	2020-0731 BOR Board Member Ballot_Responses_SurveyMonkey.pdf		8/12/2024
	CTX_005589-	2020-0731 BOR Travel Expense Reimbursement(8).pdf		8/12/2024
	CTX_005590-	2020-0731 CTX Board Agenda_Meetign Minutes Feb&Apr&May- v.2.pdf		8/12/2024
	CTX_005713-	2020-0731 CTX Board Goals 2020-2021.pdf		8/12/2024
	CTX_005714-	2020-0731 Slides for july 2020 noard meeting.pptx		8/12/2024
	CTX_005727-	2020-1106 4.6.3_5_StratPlanYr4Report_July'19-June'20(2).pdf		8/12/2024
	CTX_005755-	2020-1106 Board devotion november 2020.pptx		8/12/2024
	CTX_005762-	2020-1106 consent b i.1a - FY21 Budgeted Operating Summary.pdf		8/12/2024
	CTX_005763-	2020-1106 consent b i.1b - FY20 Statement of Activities.pdf		8/12/2024
	CTX_005764-	2020-1106 consent b i.1c - FY20 Statement of Cash Flows.pdf		8/12/2024
	CTX_005765-	2020-1106 consent b i.1d - FY20 Statement of Financial Position.pdf		8/12/2024
	CTX_005766-	2020-1106 consent b i.3 - 3Q20 IC Presentation 10.16.2020(1).pdf		8/12/2024
	CTX_005770-	2020-1106 consent b iii_Clery Report_2020 Annual Security and Fire Safety Report_v1.pdf		8/12/2024
	CTX_005849-	2020-1106 CTX Board Agenda_Meeting Minutes July&Aug_Nov5-6_2020_v. 2.pdf		8/12/2024
	CTX_006055-	2020-1106 CTX Draft Single Audit Report.pdf		8/12/2024
	CTX_006093-	2020-1106 FY20 CTX Draft Report.pdf		8/12/2024
	CTX_006123-	2020-1106 Slide - 7-03 questions for board.pptx		8/12/2024
	CTX_006126-	2020-1106 Slides for boards discussion on fundraising.pptx		8/12/2024

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Confidential	Bates Number	Description	Date	Date Produced
	CTX_006129-	2020-1106 Student Success presentation Nov 2020.pptx		8/12/2024
<b>CENSUS DATA 2017-2023 (RFP 33-34)</b>				
	CTX_006140-	Fall17-Census.pdf	9/5/2017	8/12/2024
	CTX_006143-	Fall18-Census.pdf	9/11/2018	8/12/2024
	CTX_006146-	Fall19-Census.pdf		8/12/2024
	CTX_006147-	Fall20-Census.pdf		8/12/2024
	CTX_006148-	Fall21-Census.pdf		8/12/2024
	CTX_006149-	Fall22-Census.pdf		8/12/2024
	CTX_006150-	Fall23-Census.pdf		8/12/2024
<b>REAL ESTATE AND VALUATION (RFP 20-22; 43-44; 46)</b>				
	CTX_006151-	20 - Deed of Trust Security Agreement - Financing Statement - Concordia University 2021.pdf		8/12/2024
	CTX_006185-	20-2023.1205 Concordia University SWAP Transcript.pdf		8/12/2024
	CTX_006298-	20-Final Documents 11.6.18.pdf		8/12/2024
	CTX_006332-	43-LCEF.pdf		8/12/2024
	CTX_006333-	46-Valore Bookstore Agreement 2-15-24.pdf		8/12/2024
	CTX_006355-	768380-2023-Card.pdf		8/12/2024
	CTX_006359-	Statement of Values.XLSX		8/12/2024
	CTX_006360-	Property Workbook 8-1-24.xlsx		8/12/2024
	CTX_006361-	DRAFT 2018-2019 Austin Property Schedule.xlsx		8/12/2024
	CTX_006362-	CTX 2017-18 Section 2.pdf		8/12/2024
	CTX_006374-	Updated SOV 2020.xlsx		8/12/2024
	CTX_006375-	Property - Completed Form.pdf		8/12/2024
	CTX_006387-	Section 2 - Commercial Property.pdf		8/12/2024
	CTX_006396-	22-23 Pre-Renewal Workbook (002).xlsx		8/12/2024
	CTX_006397-	CTX 16-17 Renewal Section 2.pdf		8/12/2024
	CTX_006404-	Concordia University Tract 2024 DRAFT.pdf		8/12/2024
	CTX_006467-	Pre-Renewal Document.xlsx		8/12/2024
<b>CTX COMMUNICATIONS WITH ACCREDITATION/GOVERNANCE ORGS (RFP 29)</b>				
	CTX_006468-	Prospectus Governance Change 2022.pdf		8/12/2024
	CTX_006482-	Concordia U Texas--Governance Change Committee Report--Final.pdf		8/12/2024
	CTX_006495-	Concordia University Texas Action Letter.pdf		8/12/2024
<b>COMMUNICATIONS BETWEEN CTX AND LCMS &amp; OTHERS (RFP 12; 37-38)</b>				
	CTX_006496-	CTX letter to CUS Dr. Wenthe re proposal.pdf	7/19/2022	8/12/2024
	CTX_006498-	CTX letter to CUS Rev. Dean Wenthe.pdf	11/8/2022	8/12/2024
	CTX_006499-	CTX letter to LCMS.pdf	12/5/2022	8/12/2024
	CTX_006500-	LCMS re CTX Report for Convention FINAL.pdf	1/6/2023	8/12/2024
	CTX_006511-	CTX_Bannwolf Letter response to CUS Mundinger.pdf	2/21/2023	8/12/2024
	CTX_006512-	CTX letter to LCMS BOD Kumm.pdf	4/4/2023	8/12/2024



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Confidential	Bates Number	Description	Date	Date Produced
	CTX_006513-	CTX Memo from Don Christian Response to LCMS Ecclesiastical Visitation Report.pdf	4/21/2023	8/12/2024
	CTX_006515-	LCMS Harrison email to CTX BOR re Reconciliation.pdf	7/25/2023	8/12/2024
	CTX_006517-	LCMS letter Concordia University Texas Board of Regents.pdf	7/25/2023	8/12/2024
	CTX_006519-	LCMS Ecclesiastical Investigation Report.pdf	7/26/2023	8/12/2024
	CTX_006525-	CTX letter to Brandt, William re Regents board seat selection	8/4/2023	8/12/2024
	CTX_006526-	CTX letter to Ssekyanzi, Bob re Regents board seat selection	8/4/2023	8/12/2024
	CTX_006527-	CTX letter to Hill, Nate re Regents board seat selection	8/4/2023	8/12/2024
	CTX_006528-	CTX letter to Ruiz, Miguel re Regents board seat selection	8/4/2023	8/12/2024
	CTX_006529-	CTX letter response to LCMS re Regents board seat selection.pdf	8/14/2023	8/12/2024
	CTX_006531-	Trinity Lutheran Amarillo Letter to Bd of Regents concerning CTX.pdf	4/28/2024	8/12/2024
	CTX_006533-	CTX Response Letter to Trinity Amarillo_Packet.pdf	5/20/2024	8/12/2024
<b>CORRESPONDENCE WITH INSURER (RFP 45)</b>				
	CTX_006537-	CTX Letter to Hanover Ins. (06.01.2023).pdf	6/6/2023	8/12/2024
	CTX_006552-	Hanover Ins Response to Notice Letter 85-00391683.pdf	6/9/2023	8/12/2024
	CTX_006557-	Letter to Hanover re LCMS Complaint 9.2.2023.pdf	9/2/2023	8/12/2024
	CTX_006558-	Hanover Ins Letter with Reserv of Rights (9.12.2023) 85-00391683 ROR.pdf	9/11/2023	8/12/2024
<b>CTX INSURANCE POLICY (Amended Disclosures)</b>				
	CTX_006566-006700	HANOVER'S 2023-2024 Umbrella Policy_UHK H667943 02	7/1/2023	9/10/2024
<b>BOARD OF REGENTS MEETINGS 2021 (RFP 1-4; 28)</b>				
	CTX_006701	2021-0205 2.3.2021 Investment Committee Meeting Minutes.pdf		10/23/2024
	CTX_006702	2021-0205 CTX Board Agenda Feb 5 2021 - v. 2(1).pdf		10/23/2024
	CTX_006867	2021-0205 Graduation.pptx		10/23/2024
	CTX_006883	2021-0205 Knowing our students Feb2021.pptx		10/23/2024
	CTX_006909	2021-0205 Strat Plan 2026 - Roll-Out - Board Report 2-5-21 (2).pdf		10/23/2024
	CTX_006941	2021-0205 Strat Plan 2026 - Roll-Out - Board Report 2-5-21 (2).pptx		10/23/2024
	CTX_006973	2021-0416 Chris Fitzgerald devo Video link.pdf		10/23/2024
	CTX_006974	2021-0416 CTX Board Agenda with Feb Meeting Minutes_Apr16_2021_v. 2.pdf		10/23/2024
	CTX_007060	2021-0416 Strategy Video Final 1.mp4		10/23/2024
	CTX_007061	2021-0416 Strategy Video w Bloopers.mp4		10/23/2024
	CTX_007062	2021-0917 Board orientation 2021.pptx		10/23/2024
	CTX_007142	2021-0917 CTX Board Agenda with Apr Meeting Minutes_Sep17_2021_v. 2.pdf		10/23/2024
	CTX_007251	Financial Spreadsheet EmbeddedFile1.xlsx		10/23/2024
	CTX_007252	Financial Spreadsheet EmbeddedFile2.xlsx		10/23/2024
	CTX_007253	Financial Spreadsheet EmbeddedFile3.xlsx		10/23/2024
	CTX_007254	2021-0917 Grant-Board.jpg		10/23/2024
	CTX_007255	2021-0917 HC Board Mtg.pdf		10/23/2024
	CTX_007299	2021-0917 Landscape of Higher Ed - 2021.pptx		10/23/2024
	CTX_007335	2021-0917 Training Manual 2021-09.pdf		10/23/2024



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Confidential	Bates Number	Description	Date	Date Produced
	CTX_007460	2021-1203 comparison of two models (002).docx		10/23/2024
	CTX_007462	2021-1203 CTX Board Agenda with Sept Minute Meetings_Dec2-3_2021_v. 2.pdf		10/23/2024
	CTX_007691	Financial Spreadsheet EmbeddedFile1.xlsx		10/23/2024
	CTX_007692	Financial Spreadsheet EmbeddedFile1.xlsx		10/23/2024
	CTX_007693	Financial Spreadsheet EmbeddedFile2.xlsx		10/23/2024
	CTX_007694	2021-1203 CTX board presentation 12.3.21.pdf		10/23/2024
	CTX_007706	2021-1203 LCMS-2019-Handbook.pdf		10/23/2024
	CTX_007926	2021-1203 Nov 2021 - Academic & Student Life.pptx		10/23/2024
<b>BOARD OF REGENTS MEETINGS 2022 (RFP 1-4; 28)</b>				
	CTX_007936	2022-0211 Board of Regents Meeting Evaluation.pdf		10/23/2024
	CTX_007942	2022-0211 BOR Board Meeting Expense Form 2022-02(2).xlsx		10/23/2024
	CTX_007943	2022-0211 CTX Board Agenda with Dec Meeting Minutes_Feb11_2022_v.2.pdf		10/23/2024
	CTX_008040	2022-0211 KVUE Profiles JPs Pancake Comany.docx		10/23/2024
	CTX_008041	2022-0429 Board Resolution to Amend Purpose Clause of Articles of Incorporation 4.27.2022.doc		10/23/2024
	CTX_008043	2022-0429 Concordia Sports - Dream Day.pdf		10/23/2024
	CTX_008044	2022-0429 CTX Board Agenda with Feb Meeting Minutes_Apr29_2022_v.2.pdf		10/23/2024
	CTX_008103	2022-0429 NOMINATIONS COMMITTEE - Board Member Interviews for Term Re-Engagement.pdf		10/23/2024
	CTX_008104	2022-0714 3-year pro forma assumptions.pdf		10/23/2024
	CTX_008105	2022-0916 Board - 4 things - Sept22.pptx		10/23/2024
	CTX_008112	2022-0916 Board Education- Small Endowment Data v2 - Sept22.pptx		10/23/2024
	CTX_008124	2022-0916 Board Member Expectations Agreement - 2022(1).pdf		10/23/2024
	CTX_008125	2022-0916 Board of Regents Meeting Evaluation.pdf		10/23/2024
	CTX_008132	2022-0916 BOR Board Meeting Expense Form 2022-09.xlsx		10/23/2024
	CTX_008133	2022-0916 CTX Board Agenda with Apr&Jul Meeting Minutes_Sep16_2022_v.2.pdf		10/23/2024
	CTX_008256	2022-0916 FY2021 Annual Cau CTX_for FY22.xlsx		10/23/2024
	CTX_008257	2022-0916 Presentation on governance-Sept22.pptx		10/23/2024
	CTX_008276	2022-0916 Presentation SC 9_16_2022.pptx		10/23/2024
	CTX_008285	2022-1017 853 Hymn for Devotion 2022-10-17.pdf		10/23/2024
	CTX_008286	2022-1017 Concordia Decision.pdf		10/23/2024
	CTX_008288	2022-1108 Board Resolut to Amend Articles Bylaws and Policy Manual11.07.22.docx		10/23/2024
	CTX_008291	2022-1108 Devotion Link.docx		10/23/2024
	CTX_008292	2022-1108 Devotion special board meeting 11-8-22.docx		10/23/2024
	CTX_008293	2022 Sept, Oct and Nov Meeting Minutes presented at meeting Dec 8-9_2022.pdf		10/23/2024
	CTX_008305	CTX Amended & Restated Bylaws 11.07.2022 Draft.docx		10/23/2024
	CTX_008318	CTX Amended Board Policy Manual 11.07.2022 Draft.docx		10/23/2024

**DEFENDANTS' PRIVILEGE LOG**

Document ID	Date	Document	Privilege
2222542	2/11/2020	Concordia Board Minutes 2-7-2020 with exec.docx	1st Amendment;Work-Product; Attorney-Client
123	2/5/2021	Board Resolution re 7-03.docx	1st Amendment
242	4/16/2021	Board proposal to study other models april 2021.docx	1st Amendment
264	9/16/2021	Board presentation on governance models.pptx	1st Amendment
158	11/22/2021	CTX Amended and Restated Articles of Incorporation - final draft(1).docx	1st Amendment;Work-Product
241	11/22/2021	CTX Bylaw changes - final draft reformat.docx	1st Amendment;Work-Product
94	11/22/2021	CTX BOR Policy Manual - final draft.docx	1st Amendment;Work-Product
73	11/27/2021	CTX Bylaw Changes- final draft Redline of Nov 2009 Version to 11-22-21.docx	1st Amendment;Work-Product
263	11/28/2021	CTX Policy Manual Changes - final draft Redline of 8-13-2020 to 11-28-21.docx	1st Amendment;Work-Product
162	11/29/2021	Concordia University Texas Bylaws - Redline of Nov 2009 Version to Version 10.18.21 Clea.pdf	1st Amendment;Work-Product
270	11/29/2021	CTX Policy Manual Changes - final draft Redline of 8-13-2020 to 11-28-21.pdf	1st Amendment;Work-Product
148	12/1/2021	LCMS Risk and cost v3.xlsx	1st Amendment
164	12/2/2021	CTX Amended and Restated Articles of Incorporation - final draft.docx	1st Amendment;Work-Product
79	12/3/2021	Board Resolution re new governance model 12.3.21 (1).docx	1st Amendment
99	12/3/2021	Board Resolution re new governance model 12.3.21.docx	1st Amendment
2222500	3/4/2022	LCMS BOD Response Summary(1).pdf	1st Amendment;Work-Product; Attorney-Client
127	4/28/2022	CTX Resolution re separation 4.28.2022.docx	1st Amendment;Work-Product
161	4/28/2022	CTX Resolution re separation v.2.docx	1st Amendment;Work-Product

**DEFENDANTS' PRIVILEGE LOG**

Document ID	Date	Document	Privilege
122	4/28/2022	CTX Resolution re separation v.2.docx	1st Amendment;Work-Product
216	4/29/2022	Apr 2022 Board.pptx	1st Amendment
116	7/8/2022	LCMS Multi-Year Proforma.pdf	1st Amendment
82	7/11/2022	CTX Covenant of Lutheran Identity - draft BOR Meeting.pdf	1st Amendment
220	7/12/2022	CTX Separation Proposal Document - draft BOR Meeting(2).pdf	1st Amendment;Work-Product
212	9/16/2022	Draft Board motions Sept22.docx	1st Amendment
207	9/16/2022	Board Resolution draft Sept22.docx	1st Amendment
250	11/8/2022	Board presentation 11-8-22.pptx	1st Amendment;Work-Product
320	11/8/2022	Notes re Nate Hill presentation.pdf	1st Amendment;Work-Product

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**Time Logged by Attorneys and Staff at Richards Rodriguez and Skeith Responding to  
Discovery Propounded by LCMS on CTX**

**Run: October 23, 2024**

<b>Date</b>	<b>Tmkr</b>	<b>Hours</b>	<b>Description</b>
07/16/2024	31	0.3	Brief review of requests for production and interrogatories from the LCMS.
07/16/2024	31	0.2	Correspondence with client re: responding to the LCMS requests for production and interrogatories.
07/16/2024	31	0.1	Phone call with client: responding to requests for production.
07/16/2024	16	0.2	Correspondence to clients re discovery requests propounded to CTX and meeting to discuss same.
07/16/2024	16	0.2	Review discovery requests in preparation with phone call with e-discovery vendor.
07/16/2024	16	0.3	Telephone conference with e-discovery vendor re collection of email data and case info for conflict check.
07/17/2024	31	2.5	Study Requests for Production and Interrogatories from LCMS to develop strategy to respond and proposed answers.
07/17/2024	31	0.5	Review draft answers to interrogatories re: CTX compliance with LCMS
07/17/2024	9	0.3	Review and analyze LCMS discovery requests to CTX.
07/17/2024	9	0.2	Review documents referenced by LCMS discovery requests.
07/17/2024	9	0.7	Draft proposed answers to interrogatories ## 17-23.
07/17/2024	4	0.9	Read and categorize interrogatories and requests for production propounded to
07/17/2024	4	0.3	Review documents referenced in interrogatories and requests for production.

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07/17/2024	4	2.3	Draft initial responses to interrogatories and requests for production in preparation for meeting with clients.
07/17/2024	4	0.4	Discussion with Albert re historical information and university procedures in preparation for meeting with client.
07/18/2024	31	2	Meeting with clients to discuss responses to interrogatories and documents available for production response to RFPs.
07/18/2024	16	2	Zoom meeting with client to discuss written discovery requests and retrieval of responsive documents.
07/18/2024	16	0.4	Zoom meeting with client re access to Blackboard for corporate documents responsive to discovery requests.
07/18/2024	16	0.5	Zoom meeting with Disco regarding forensic retrieval and hosting of data and expectations re same.
07/18/2024	16	0.4	Begin drafting responses to Request for Production based on discussions with
07/18/2024	16	0.4	Begin compiling responsive documents for production.
07/18/2024	4	2	Zoom meeting with clients to go over discovery requests and document retrieval.
07/19/2024	31	0.8	Develop search terms for e-discovery production in accordance with requests for production.
07/19/2024	16	2	Begin compiling CTX governance documents and board meeting documents for 2016-2019 from CTX's Blackboard repository for production.
07/19/2024	16	0.2	Correspondence with client re Blackboard access and documents.
07/19/2024	16	0.2	Email with Disco re step-by-step process for remote collection of personal mailboxes.
07/19/2024	4	0.6	Draft search terms.
07/19/2024	4	0.7	Compare requests for production re date ranges and data requested.
07/20/2024	16	2	Finish compiling CTX governance documents and board meeting documents for 2020-2024 from CTX's Blackboard repository for production.
07/20/2024	16	0.4	Edit draft answers to interrogatories and requests for production.

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07/22/2024	4	0.3	Draft correspondence to current and former board members of CTX re collection of emails requested by LCMS in discovery requests.
07/22/2024	31	0.5	Begin review of client's meeting minutes and board packets.
07/22/2024	31	0.3	Review and revise e-discovery letter to board members and revise search terms.
07/22/2024	16	0.3	Discussion with Albert regarding board documents for production.
07/22/2024	16	0.3	Edit letter to board members re collection of emails in response to discovery
07/22/2024	4	0.1	Review Albert's proposed search terms.
07/23/2024	31	1.5	Document review (board meeting documents)
07/23/2024	31	1.2	Work on identity of officers/directors for e-discovery record retrieval and process for obtaining discovery; meeting with D. Richards and K. Esparza re: same; emails with client re: same.
07/23/2024	16	0.3	Meeting with Dan and Albert regarding list of custodians for email collection.
07/23/2024	16	0.3	Communications with Disco regarding contract and logistics for email collection.
07/23/2024	4	0.2	Correspondence from client re correspondence acquisition and search terms.
07/23/2024	4	0.3	Meeting with Albert Carrion re data search and acquisition.
07/23/2024	4	0.3	Correspondence to client re data search and acquisition of emails.
07/23/2024	4	0.2	Review list of officers, directors and current and former board members for e-discovery acquisition.
07/23/2024	4	0.3	Review and execute contract with Disco for e-discovery collection and database.
07/23/2024	4	0.3	Edit letter to custodians re acquisition and search terms.
07/24/2024	31	1	Work on e-discovery database, CTX emails and board member matters; review and revise database tags.
07/24/2024	16	0.3	Emails with Disco team re status of custodians for email collection.
07/24/2024	16	0.4	Ingest board documents from 2016-2024 into Disco database.
07/24/2024	16	0.5	Review documents and pleadings to create list of tags for database and send to Albert for his input.

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07/24/2024	16	0.2	Email exchange with client re documents responsive to requests for production.
07/24/2024	16	0.4	Review documents uploaded to share folder by client in preparation for production.
07/24/2024	4	1	Multiple correspondence re communications to board members and CTX executive team re discovery request and searches.
07/25/2024	31	1.3	Review and revise answers to interrogatories.
07/25/2024	9	0.4	Draft objections and responses to interrogatories.
07/25/2024	4	1.2	Draft objections and responses to several interrogatories and requests for production.
07/25/2024	4	0.3	Confer with Clark re objections to interrogatories.
07/25/2024	4	0.6	Review board meeting minutes and other documents from Nov 2022 and April 2023 for answering certain interrogatories.
07/25/2024	4	0.3	Correspondence to client and others re draft interrogatories for review.
07/25/2024	4	0.3	Multiple communications with board members re discovery and logistics.
07/25/2024	16	0.1	Email to CTX IT person re email collection.
07/25/2024	16	0.2	Emails with client re list of current/former board members.
07/25/2024	16	0.5	Read emails and respond to CTX board members re consent and email collection process.
07/25/2024	16	0.6	Phone calls with 3 former board members re email collection process.
07/25/2024	16	0.4	Prepare spreadsheet to track forensic email collection.
07/25/2024	16	0.3	Email to client re board member votes and status of other discovery items.
07/26/2024	31	1.6	Work on drafting answers to interrogatories; review documents regarding same
07/26/2024	16	0.2	Email exchange with regent re written statement from employer
07/26/2024	16	0.3	Prepare and send request to employer re written statement re deletion of emails for former regent
07/26/2024	16	0.2	Email with Disco forensics team re consent from regents
07/26/2024	16	0.2	Email exchange with current regent re consent and email collection process.

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07/26/2024	16	0.1	Email exchange with current regent re status of employer release.
07/26/2024	16	0.4	Review documents pertaining to board seats in response to discovery requests.
07/26/2024	4	0.6	Multiple correspondence with clients regarding discovery responses and production of documents.
07/26/2024	4	0.3	Multiple correspondence with current and former board members re e-discovery collection.
07/26/2024	4	0.2	Correspondence to and from board members re email hosts.
07/26/2024	4	0.5	Review draft responses to requests for production for purposes of objections.
07/26/2024	4	1.6	Edit responses and objections to requests for production.
07/26/2024	31	0.4	Research documents exchanged between CTX and LCMS
07/27/2024	16	2.2	Prepare timeline of board activity in preparation to respond to discovery requests.
07/27/2024	16	1.4	Review of meeting minutes and other board documents to support CTX timeline and timeline of all events.
07/27/2024	16	0.4	Revise answers to interrogatories relating to CTX amendments.
07/27/2024	9	0.3	Research on work product privilege rules for responding to federal requests for production.
07/27/2024	9	0.4	Revise and edit objections and responses to requests for production.
07/29/2024	8	1.3	Research on discovery production questions; email to CRichards and Drichards re: same
07/29/2024	4	0.4	Check date range in discovery requests regarding litigation timeline.
07/29/2024	4	0.3	Discussion regarding status of ediscovery information.
07/29/2024	16	0.1	Email follow up to CTX IT person re ediscovery collection.
07/29/2024	16	0.1	Email to client re making contact with CTX IT for ediscovery collection.
07/29/2024	16	0.2	Email with client re status of documents for production.
07/29/2024	16	0.6	Review and compile Blackboard online list of documents for board meetings from 2016 to present for purpose of production and to discuss with client.



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07/29/2024	16	0.1	Email from a former employer of a former board member re protection of
07/29/2024	31	0.4	Review former board member response to D. Richards email re: e-discovery and brief analysis re: same.
07/30/2024	31	0.3	Review draft interrogatory answers from client
07/30/2024	31	0.5	Discussion with D. Richards and email to client re: amending commencement date for emails from boxes used by newer board members.
07/30/2024	4	0.3	Read correspondence from board member re ediscovery extraction.
07/30/2024	4	0.3	Read correspondence from client regarding interrogatory responses.
07/30/2024	16	0.2	Email exchange with Disco ediscovery team re Concordia's IT's proposed in-house collection.
07/30/2024	16	0.2	Telephone conference with CTX IT manager re Disco's direct email collection process.
07/30/2024	16	0.2	Email to CTX IT re date ranges and custodians.
07/30/2024	16	0.2	Email with Disco forensics team re status of email collection.
07/31/2024	31	0.4	Emails with client re: review of list of e-discovery mailboxes and current/former leadership team at CTX; review list from client.
07/31/2024	31	0.3	Review client's proposed revisions to interrogatories and further revise draft answers; circulate to team for upcoming meeting with client.
07/31/2024	16	1.8	Email collection management with Disco and custodians.
07/31/2024	4	0.2	Read correspondence regarding email extraction status.
07/31/2024	4	0.2	Discussions with Albert and Karina regarding search protocol.
07/31/2024	4	0.3	Identify domain names and difficulty with domain searches.
07/31/2024	4	0.3	Correspondence exchange with clients re board members.
07/31/2024	31	0.6	Work on logistics and follow-up notifications to board members re: e-discovery.
08/01/2024	31	0.6	Zoom meeting with client re: responses interrogatories and requests for production.

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08/01/2024	31	0.5	Review and respond to employer of board member who requested explanation as to why emails being retrieved from employer, and review follow up email from employer.
08/01/2024	31	2	Review email from client re: changes to interrogatory answers; prepare revisions to interrogatories and draft response to client.
08/01/2024	4	0.5	Video conference with clients re discovery responses.
08/01/2024	4	0.3	Read current draft answers to interrogatories.
08/01/2024	4	0.3	Conference with Albert re draft answers to discovery.
08/01/2024	4	0.6	Edit draft responses to requests for production.
08/01/2024	16	0.5	Prepare for meeting with clients re discovery by updating spreadsheet on email collection per custodian and list of documents collected from client in response to discovery requests.
08/01/2024	16	0.5	Meeting with CTX to discuss status of discovery responses and documents.
08/01/2024	16	1.8	Email collection management with Disco and custodians.
08/01/2024	4	0.4	Multiple correspondence with client regarding documents and discovery answers.
08/02/2024	4	0.3	Read responses to client's comments to interrogatories.
08/02/2024	4	0.4	Add edits to responses to requests for production and interrogatories.
08/02/2024	4	0.3	Correspondence re latest responses to requests for production and interrogatories.
08/02/2024	4	2.3	Begin reviewing and tagging CTX board meeting documents for production.
08/02/2024	16	0.7	Email collection management with Disco team and custodians.
08/02/2024	9	0.6	Revise and edit draft responses to requests for production.
08/02/2024	4	0.2	Multiple correspondence regarding distribution of agendas and packets.
08/02/2024	16	1	Meetings with Dan, Clark and Albert re Tabs, confidentiality, relevancy and assignment of tasks for document review.

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08/02/2024	16	0.9	Edit Tags and organize Folders in database for purposes of document review and production.
08/02/2024	16	0.4	Emails with client re documents needed in response to discovery requests.
08/02/2024	31	2.2	Document review of 2016 - 2017 board meeting folders
08/05/2024	31	0.7	Exchange multiple emails with client re: answers to interrogatories and requests for production.
08/05/2024	31	4	Document review concerning CTX board minutes, agenda and attachments.
08/05/2024	4	0.3	Review current draft discovery responses.
08/05/2024	4	0.2	Review update on mailbox collections and proposed word searches.
08/05/2024	4	0.2	Correspondence with Albert regarding client requests and production responses.
08/05/2024	4	1.9	Continue review and tagging of CTX board meeting documents for production.
08/05/2024	16	0.5	Email collection management with Disco team and custodians; update spreadsheet re same.
08/05/2024	16	0.2	Email to current board member re release of emails.
08/05/2024	16	0.5	Review comments and further tag in 2018-2019 interactive board agenda packets for relevance and production.
08/06/2024	31	3.2	Work on document review of board meeting minutes and conducting searches with DISCO
08/06/2024	31	0.4	Phone call with client to finalize draft response to interrogatories and make final changes to same.
08/06/2024	16	0.3	Email collection management with Disco team and custodians; update spreadsheet re same.
08/06/2024	16	0.8	Video conference with Disco forensics team regarding database and review.
08/06/2024	4	0.8	Video conference with Disco re database review and searches.

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08/06/2024	4	0.4	Discussion with Albert re ediscovery search and document production.
08/06/2024	4	0.5	Continue reviewing and tagging documents for production.
08/07/2024	4	2	Continue reviewing and tagging documents for production.
08/07/2024	31	3	Work on review of board packet, enrollment, governance, board handouts for production.
08/07/2024	16	0.4	Review and edit draft responses to requests for production.
08/07/2024	16	0.2	Emails with client regarding documents still needed for production.
08/07/2024	16	0.3	Ingest additional documents into database for review for production.
08/07/2024	16	0.2	Correspondence with e-forensic project manager regarding timing for applying search terms.
08/07/2024	16	0.4	Review new documents for production.
08/08/2024	31	2	Work on revisions to answers to interrogatories and requests for production.
08/08/2024	31	1	Prepare letter for board member employer re: retrieval of board member emails from employer server; review emails from employer re: same.
08/08/2024	31	1.2	Document review of enrollment, appraisal, and board minute packets.
08/08/2024	16	0.5	Email collection management with Disco team and custodians; update spreadsheet.
08/08/2024	16	0.3	Ingest appraisal and valuation documents into Disco for review
08/08/2024	16	0.8	Review tagged documents for production.
08/08/2024	16	1.2	Meeting and Dan and Albert to go over discovery responses, document production and proposed protective order.
08/08/2024	16	0.9	Make additional edits to responses to requests for production and interrogatories.
08/08/2024	16	0.2	Correspondence with client re additional documents for production.
08/08/2024	16	0.1	Correspondence with current regent re access to work email denied.
08/08/2024	16	0.3	Review executive meeting minutes and ingest into Disco database for further review.

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08/08/2024	16	0.4	Review previous produced documents and cite references in responses to requests for production.
08/08/2024	4	1	Continue reviewing and tagging documents for production.
08/08/2024	4	0.5	Edit responses to requests for production and answers to interrogatories.
08/08/2024	4	0.5	Meeting with Albert to go over redline revisions to responses to interrogatories and requests for production.
08/09/2024	31	2.8	Document review and analysis of relevant production dates.
08/09/2024	31	0.5	Emails with client re: status, purpose and use of documents contained in board agenda packets.
08/09/2024	31	0.8	Review and revise responses to requests for production and circulate internal questions re: production.
08/09/2024	16	0.3	Make additional edits to responses to requests for production.
08/09/2024	16	2	Continue reviewing tagged documents for production.
08/09/2024	4	2	Continue document review for production.
08/09/2024	4	0.4	Edit discovery responses regarding work product privilege.
08/09/2024	4	0.2	Discussions with Albert and Karina regarding documents for production.
08/10/2024	16	2	Continue reviewing tagged documents for production.
08/12/2024	31	2.8	Document review; acquiring documents for production and emails and phone call with client re: same.
08/12/2024	16	3.5	Continue reviewing tagged documents for production.
08/12/2024	16	0.6	Run final production on documents being produced with written responses.
08/12/2024	16	0.2	Correspondence to client re verifying answers to interrogatories.
08/12/2024	16	0.2	Prepare transmittal letter to opposing counsel regarding discovery responses and Box link for document production.
08/12/2024	16	0.9	Review financial documents and other agenda items for redactions.
08/12/2024	4	0.8	Review tagged documents for decision on production v withholding for confidential/privilege.

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08/12/2024	4	0.2	Discussions re email extraction for board member with HIPPA violation concerns.
08/14/2024	31	0.4	Revise email to client re: status of documents production and ediscovery/email retrieval.
08/14/2024	4	1.5	Continue review and tagging of board documents for 2021.
08/14/2024	16	0.5	Email collection management with Disco team and custodians; update spreadsheet.
08/14/2024	16	0.4	Prepare email to clients regarding status of email collection, written discovery, document production and documents still needed.
08/14/2024	31	1.3	Review 2022 Board file for hot document and privilege designations; phone call with D. Richards re: same.
08/14/2024	31	0.4	Review and email to client re: draft resolutions and ppts shown at Board
08/15/2024	31	0.5	Meetings with D. Richards re: CTX document production of 2021 and 2022 Board Meeting documents.
08/15/2024	4	2.3	Continue reviewing and tagging 2021-2022 board documents for production.
08/15/2024	4	0.2	Meeting with Albert to discuss 2021-2022 board document review.
08/16/2024	31	2.5	Document review of board minutes; meeting with D. Richards re: same.
08/16/2024	4	1.4	Continue reviewing and tagging 2021 board meeting packets for document production.
08/16/2024	4	0.6	Begin reviewing and tagging 2022 board meeting packets for document production.
08/19/2024	4	1	Finish review and tagging of 2022 board meeting packets for production.
08/19/2024	16	0.2	Emails with Disco team re status of mailbox collection and meeting to discuss
08/19/2024	16	0.5	Update mailbox collection spreadsheet and review email custodians in database in preparation for meeting.
08/20/2024	4	1	Final review of 2021 and 2022 documents for production.
08/20/2024	4	0.4	Discussion with Albert re 2021-2022 board documents for production.
08/20/2024	4	0.8	Video conference with Disco team regarding emails searches and sorting.

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08/20/2024	16	0.9	Zoom meeting with Disco regarding search terms and tagging junk mail.
08/20/2024	16	0.8	Begin mass tagging emails related to junk.
08/20/2024	31	1	Meeting with Disco e-discover vendor re: searching and CTX databases.
08/20/2024	31	2.6	Work on document review.
08/21/2024	31	0.4	Email to client re: November 8, 2022 Board Meeting and review reply.
08/21/2024	31	0.7	Research and compare draft November 8, 2022 board meeting documents with final versions.
08/21/2024	16	3	Continue to review, sort/filter and tag likely junk mail from the 182,549 emails before promoting into active database.
08/22/2024	16	2	Continue to review, sort/filter and tag likely junk mail from the 182,549 emails before promoting into active database.
08/22/2024	31	0.8	Analysis of CTX Board documents and emails with client re: same.
08/23/2024	16	2	Continue to review, sort/filter and tag likely junk mail from the 182,549 emails before promoting into active database.
08/24/2024	16	1	Review more 2021-2022 board documents and tag for production.
08/24/2024	16	2.5	Continue to review, sort/filter and tag likely junk mail from the 182,549 emails before promoting into active database.
08/26/2024	31	0.6	Review additional documents for redaction and production.
08/26/2024	16	0.3	Review 2022 board documents in database re redactions and privilege.
08/30/2024	16	0.2	Correspondence with Disco team re status of further mailbox collections.
09/04/2024	31	0.3	Emails with client and send Umbrella Policy for production.
09/04/2024	16	0.5	Extract meeting minutes from board agenda packets for years 2021-2022 and ingest into Disco for production.
09/04/2024	16	0.5	Review and remove tags for production of 2021-2022 Board Meeting docs due to privilege issues.
09/06/2024	16	2	Continue to review, sort/filter and tag likely junk mail from the 182,549 emails before promoting into active database.

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09/08/2024	16	2.5	Continue to review, sort/filter and tag likely junk mail from the 182,549 emails before promoting into active database.
09/10/2024	31	2	Document review for 1st Amendment matters in board documents
09/10/2024	31	1	Work on gathering and review documents for production today and update of Amended Disclosures.
09/10/2024	16	0.5	Edit tag designations for documents in database.
09/10/2024	16	0.4	Edit amended disclosures to update board members and documents produced.
09/10/2024	16	0.2	Bates label umbrella insurance policy for production.
09/10/2024	16	0.2	Prepare and send letter to counsel with amended disclosures and supplemental production.
09/15/2024	16	2	Continue to review, sort/filter and tag likely junk mail from the 182,549 emails before promoting into active database.
09/16/2024	8	0.1	Review letter from opposing counsel objecting to discovery objections
09/16/2024	16	0.2	Correspondence to Disco team regarding email date ranges.
09/16/2024	16	0.3	Draft brief summary of data collected by number of custodians for responding to discovery deficiency letter.
09/16/2024	16	1	Continue to review, sort/filter and tag likely junk mail from the 182,549 emails before promoting into active database.
09/17/2024	16	0.3	Correspondence with Disco team regarding date filters.
09/17/2024	16	0.3	Edit interrogatory answer with 1st amendment privilege objection.
09/17/2024	16	0.2	Edit letter to opposing counsel responding to discovery deficiency letter.
09/17/2024	4	0.3	Draft letter to Steven Levatino in response to discovery deficiency.
09/17/2024	4	1	Read discovery responses and begin amended answers to same.
09/20/2024	4	0.3	Finish amended responses to Request for Production.
09/20/2024	4	0.2	Finalize correspondence to opposing counsel re amended discovery responses.
09/20/2024	16	0.4	Make final edits to amended responses to Interrogatories and Request for Production and serve on opposing counsel.



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09/22/2024	16	0.4	Begin preparing privilege log.
09/23/2024	31	2.2	Review 2022 Board Packet documents for privileged information.
09/23/2024	16	0.2	Discussion with Albert regarding privilege log.
09/24/2024	8	0.1	Conference with DRichards & CRichards re: discovery review management
09/24/2024	8	0.4	KEsparza re: discovery database management
09/24/2024	8	0.7	Review domain names in discovery database to remove junk
09/24/2024	31	2.4	Review 2022 Board Packet documents for privilege documents and analysis of resolutions passed to disclose despite privilege.
09/25/2024	8	0.2	review board minutes for whether to waive 1st amendment privileges
09/25/2024	8	1	review discovery database to cull junk emails
09/25/2024	31	1.7	Review J. Richards comments regarding board packet document review and revise privilege designations board minutes and packets from late 2020 - 2022; reply email to J. Richards.
09/25/2024	31	0.1	Phone call with client re: notation on board packet document
09/30/2024	8	1.5	Review discovery database to cull junk emails
09/30/2024	4	1.3	Review and edit tags of 2021 board packet for privilege claims.
09/30/2024	4	0.2	Discussion with Albert re privilege claims on 2021 board packet materials.
10/01/2024	8	0.9	Review discovery database to cull junk emails
10/01/2024	4	1	Review and edit tags for 2022 CTX board packet for privilege claims.
10/01/2024	4	0.5	Meet with Albert to finalize tags for 2022 CTX board packet materials.
10/01/2024	4	0.5	Review separation proposal and documents re: LCMS actions prior to separation.
10/02/2024	8	0.1	Conference with CRichards re: discovery review process
10/02/2024	8	0.7	Finish reviewing the discovery database to cull junk mail
10/02/2024	8	0.2	conference with KEsparza re: discovery review of active discovery database
10/02/2024	8	0.2	conference with KEsparza re: preparing for meeting with staff to help review discovery database
10/02/2024	8	0.1	Review discovery database for relevant documents

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10/02/2024	16	0.3	Emails with Disco team re promoting documents to active database and setting
10/02/2024	16	1.5	Review and tag 400 documents in database for relevance.
10/02/2024	4	0.5	Discussion re: next steps on document review and status of filtering and search terms and privilege.
10/03/2024	8	0.7	Meeting with case attorneys and staff re: discovery database review process
10/03/2024	8	1.5	Prepare guides to responsiveness and discovery review process for attorneys and staff that will review database
10/03/2024	8	1.4	Review discovery database for responsive documents
10/03/2024	31	0.5	Meeting to discuss document analysis and production.
10/03/2024	16	2	Review and tag 600 documents in database for relevance.
10/03/2024	16	0.5	Attend video conference re document review.
10/03/2024	16	0.2	Correspondence with Disco team re batch document review process.
10/03/2024	31	2	Document review of emails.
10/03/2024	31	0.3	Review and revise responsiveness document tool.
10/03/2024	4	0.5	Video conference with document review team re: search results, relevance review and privilege.
10/03/2024	4	0.3	Discussion re: staffing for doc review and steps for same.
10/03/2024	9	0.9	Developing strategy and plans for review of 100k+ documents for discovery production
10/03/2024	30	0.6	Mtg re discovery database review process
10/04/2024	8	0.6	Prepare instruction document for mass tagging related documents in discovery database
10/04/2024	8	0.7	Conference with MAbbit and ARam re: assignment for discovery review in database
10/04/2024	8	2	Review active discovery database for responsive documents
10/04/2024	8	0.1	Conference with KEsparza and MAbbit re: discovery review
10/04/2024	31	2	Document review of emails.

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10/04/2024	16	0.3	Multiple emails with Disco team re batch review features for efficient review process.
10/04/2024	16	0.5	Video conference with review team to discuss review procedures.
10/04/2024	16	0.5	Video meeting with Disco team regarding batch reviewing and de-duplication.
10/04/2024	16	3	Review and tag 400+ documents in database for relevance.
10/04/2024	30	0.6	Confer with J. Richards re: assignment for discovery review in database
10/04/2024	30	0.5	Video mtg w/ Disco team re batch review/document dupes
10/04/2024	30	0.8	Begin review of batch docs for responsiveness
10/04/2024	4	0.4	Review documents identified as privileged.
10/04/2024	4	0.2	Discussions with Karina re privilege documents.
10/04/2024	23	0.5	Call with J. Richards and K. Esparza regarding document review assignment
10/05/2024	16	1.6	Review and tag 400 documents in database for relevance.
10/07/2024	8	0.2	MAbbit re: questions on whether some documents in discovery database are responsive to requests
10/07/2024	8	0.1	E-mail correspondence to discovery review team re: time to discuss potential inconsistencies in review
10/07/2024	8	3.6	Review several hundred documents in discovery database for relevance
10/07/2024	30	2.8	Review 500 documents in database for responsiveness to LCMS requests for
10/07/2024	30	0.2	Confer w/ J. Richards re production responsiveness questions
10/07/2024	23	1	Setting up disco and beginning to review batch of documents
10/08/2024	8	0.6	ACarrion, MAbbit, and ARam re: consistency in document review
10/08/2024	8	1.9	Review 600 documents in database for responsiveness to LCMS requests for production
10/08/2024	30	0.4	Confer w/ J. Richards, A. Ram, and A. Carrion re consistency in doc review
10/08/2024	30	1.6	Review of 400 documents in database for responsiveness to LCMS requests for
10/08/2024	31	2.6	Document review of emails.

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10/08/2024	31	0.5	Analysis of email document review issues and protocols for database and responsiveness.
10/08/2024	23	0.5	Meeting with J. Richards, A. Carrion regarding document review consistency
10/09/2024	8	1	Review 350 documents in discovery database for responsiveness
10/09/2024	31	3.2	Document review of 600 email files.
10/09/2024	30	3	Review of 800 documents in discovery database for responsiveness to LCMS requests for production.
10/10/2024	8	0.4	Conference with KEsparza re: discovery review database and process
10/10/2024	8	2.1	Review several hundred documents in discovery database
10/10/2024	30	3.6	Review of 1000 documents in discovery database for responsiveness to LCMS requests for production.
10/11/2024	8	1.6	Review several hundred documents in discovery database for responsiveness
10/11/2024	30	2.2	Review of 400 documents in discovery database for responsiveness to LCMS requests for production
10/12/2024	8	0.4	review a batch of documents in discovery database for responsiveness
10/14/2024	8	0.4	Meeting with Disco about removing tagged and duplicate documents from review database
10/14/2024	8	0.2	MAbbitt re: questions on responsiveness for some documents in database
10/14/2024	8	2.8	Review several hundred documents in discovery database for responsiveness
10/14/2024	16	0.4	Zoom meeting with Disco team re near duplication of email documents.
10/14/2024	30	2.4	Review of 600 documents in discovery database for responsiveness to LCMS requests for production
10/14/2024	30	0.2	Confer with J. Richards re questions on responsiveness for some documents in database
10/15/2024	31	1.3	Document review of emails.

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10/15/2024	30	0.8	Review of 200 documents in discovery database for responsiveness to LCMS requests for production
10/16/2024	8	3.6	Review 1,400 documents in discovery database for responsiveness
10/16/2024	31	1.2	Document review of emails.
10/16/2024	30	3.1	Review of 800 documents in discovery database for responsiveness to LCMS requests for production
10/16/2024	16	0.6	Review and tag 150+ documents in database for relevance.
10/17/2024	8	0.4	Conference with AGambardella re: discovery review for responsiveness
10/17/2024	8	3.5	Review 1,200 documents in discovery database for responsiveness
10/17/2024	31	2	Document review of emails.
10/17/2024	30	2.8	Review of 800 documents in discovery database for responsiveness to LCMS requests for production
10/17/2024	20	0.4	Conference with J. Richards and K. Esparza re production project and guidelines
10/18/2024	31	1.5	Document review of emails.
10/18/2024	8	1.5	review a few hundred documents in discovery database for responsiveness
10/18/2024	30	3	Review of 800 documents in discovery database for responsiveness to LCMS requests for production
10/21/2024	8	3.4	Review 1,200 documents in discovery database for responsiveness
10/21/2024	20	0.5	Review of case file and revisit instructionals for document review
10/21/2024	20	2.3	Begin review of documents in discovery database for responsiveness
10/21/2024	31	1	Document review of emails.
10/22/2024	30	0.8	Review of 200 documents in discovery database for responsiveness to LCMS requests for production
10/22/2024	8	4	Review 1,600 documents in discovery database for responsiveness
10/22/2024	31	5	Document review of 1000 emails.
10/22/2024	20	1.9	Review of documents in discovery database for responsiveness

**Exhibit D to Declaration of Daniel R. Richards**  
**Page 19 of 19**

Total		312.4	
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CS Disco, Inc.  
EIN: 464254444  
ar@csdisco.com

Invoice #: 501152  
Date: 08/01/2024

**Bill To**

Richards Rodriguez & Skieth LLP  
611 W 15th St  
Austin TX 78701  
United States

**Ship To**

Richards Rodriguez & Skieth LLP  
611 W 15th St  
Austin TX 78701  
United States

Invoice Amount Due:

**\$6,571.96**

Due Date: 08/31/2024

**Review Database Name**

LCMS v. CTX

**Billing Code**

3803 - 008

**PO Number**

**DISCO Ediscovery**

Start Date	End Date	Description	Size (GB)	Pro-Rated Quantity	Price	Amount
08/01/2024	08/31/2024	Review DB Monthly Minimum for August	1	1.00	975.00	\$975.00
08/01/2024	08/31/2024	1.91 GB Active for August	1.907	1.00	0.00	\$0.00

**Subtotal**

**\$975.00**

**DISCO Services**

Date	Resource	Description	Quantity	Price	Amount
07/26/2024	Kim Reed	Forensic Project Coordination - Scope & relay collection details for examiner; coordinate collection with custodians	1.75	425.00	\$743.75
07/26/2024	Kim Reed	Forensic Project Coordination - Scope & relay collection details for examiner; coordinate collection with custodian	0.25	425.00	\$106.25
07/29/2024	Heather Hunter	00413539: Forensics - Remote collection of crmueller@yahoo.com email mailbox.	1.00	425.00	\$425.00
07/29/2024	Heather Hunter	00413538: Forensics - Remote collection of stephensohns@gmail.com email mailbox.	1.00	425.00	\$425.00
07/29/2024	Jennifer Kovacs	00413539: Forensics - peer review of one (1) email collection for C. Mueller (crmueller@yahoo.com).	0.25	425.00	\$106.25
07/30/2024	Heather Hunter	00413531: Forensics - Remote collection of mnewman@txlcms.org email mailbox.	1.00	425.00	\$425.00
07/30/2024	Kim Reed	Forensic Project Coordination - Scope & relay collection details for examiner	1.00	425.00	\$425.00
07/30/2024	Jennifer Kovacs	00413538: Forensics - peer review of one (1) email account collection belonging to S. Sohns (stephensohns@gmail.com).	0.25	425.00	\$106.25
07/31/2024	Kim Reed	Forensic Project Coordination - Scope & relay collection details for examiner; coordinate collection with new custodians	4.00	425.00	\$1,700.00
07/31/2024	Heather Hunter	00413533: Forensics - Remote collection of chrisbannwolf@att.net email mailbox.	1.00	425.00	\$425.00
07/31/2024	Kim Reed	Forensic Project Coordination - Coordinating collections and access	1.00	425.00	\$425.00
07/31/2024	Nathanael Conners	00413539: MM - Prepared destination media for forensic collection.	0.50	350.00	\$175.00
07/31/2024	Patrick Nicholson	00413531: Forensics - Peer review of M. Newman email collection.	0.25	425.00	\$106.25
07/31/2024	Jennifer Kovacs	00413533: Forensics - peer review of one (1) email account collection (chrisbannwolf@att.net).	0.25	425.00	\$106.25

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Date: 08/01/2024

DISCO Services

Date	Resource	Description	Quantity	Price	Amount
Subtotal					\$5,700.00

Reimbursable Services & Other

Date	Item	Description	Quantity	Price	Amount
07/29/2024	External Hard Drive	External Hard Drive_In-Lab Forensic Collection	1.00	229.00	\$229.00
07/29/2024	External Hard Drive	External Hard Drive_In-Lab Forensic Collection	1.00	229.00	\$229.00
Subtotal					\$458.00

Tax \$478.32

Total \$7,611.32

Amount Paid / Credits Applied (\$1,039.36)

AMOUNT DUE \$6,571.96

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ar@csdisco.com

Invoice #: 512029  
Date: 09/01/2024

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Austin TX 78701  
United States

Ship To

Richards Rodriguez & Skieth LLP  
611 W 15th St  
Austin TX 78701  
United States

Invoice Amount Due:

\$38,221.70

Due Date: 10/01/2024

Review Database Name	Billing Code	PO Number
LCMS v. CTX	3803 - 008	

DISCO Ediscovery					Pro-Rated		
Start Date	End Date	Description	Size (GB)	Quantity	Price	Amount	
08/01/2024	08/31/2024	Data Ingest: 55.62 GB to ECA	55.617	55.62	30.00	\$1,668.51	
08/02/2024	08/31/2024	Data Ingest: 338.42 GB to ECA	338.422	338.42	30.00	\$10,152.66	
08/04/2024	08/31/2024	Data Ingest: 0.005 GB to ECA	0.005	1.00	0.00	\$0.00	
08/05/2024	08/31/2024	Data Ingest: 1.02 GB to ECA	1.018	1.00	0.00	\$0.00	
08/08/2024	08/31/2024	Data Ingest: 20.96 GB to ECA	20.955	1.00	154.19	\$154.19	
08/09/2024	08/31/2024	Data Ingest: 11.88 GB to ECA	11.875	1.00	0.00	\$0.00	
08/14/2024	08/31/2024	Data Ingest: 0.12 GB to ECA	0.115	1.00	0.00	\$0.00	
08/20/2024	08/31/2024	Data Ingest: 1.15 GB to ECA	1.151	1.00	0.00	\$0.00	
08/01/2024	08/31/2024	429.16 GB ECA Monthly True Up for August	429.158	429.16	5.00	\$2,145.79	
09/01/2024	09/30/2024	429.16 GB ECA Monthly for September	429.158	429.16	5.00	\$2,145.79	
09/01/2024	09/30/2024	1.99 GB Active for September	1.99	1.99	38.00	\$75.62	
Subtotal						\$16,342.56	

DISCO Services						
Date	Resource	Description	Quantity	Price	Amount	
08/01/2024	Heather Hunter	00413702: Forensics - Remote collection of Denise@dpatrikconsulting.com email mailbox.	1.00	425.00	\$425.00	
08/01/2024	Heather Hunter	00413535: Forensics - Remote collection of slinebrink@watermission.org email mailbox.	1.00	425.00	\$425.00	
08/01/2024	Heather Hunter	00413533: Forensics - Stage email collection (chrisbannwolf@att.net) for ingestion.	0.50	425.00	\$212.50	
08/01/2024	Heather Hunter	00413538: Forensics - Stage email collection (stephensohns@gmail.com) for ingestion.	0.50	425.00	\$212.50	
08/01/2024	Heather Hunter	00413539: Forensics - Stage email collection (crmuellet@yahoo.com) for ingestion.	0.50	425.00	\$212.50	
08/01/2024	Heather Hunter	00413531: Forensics - Stage email collection (mnewman@txlcm.org) for ingestion.	0.50	425.00	\$212.50	
08/01/2024	Jennifer Kovacs	00413702: Forensics - peer review of one (1) email account collection (Denise@dpatrikconsulting.com).	0.25	350.00	\$87.50	

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Invoice #: 512029  
 Date: 09/01/2024

DISCO Services					
Date	Resource	Description	Quantity	Price	Amount
08/02/2024	Heather Hunter	00413702: Forensics - Stage email collection (Denise@dpatrikconsulting.com) for ingestion.	0.50	350.00	\$175.00
08/05/2024	Heather Hunter	00415180: Forensics - Remote collection of hddiane@gmail.com email mailbox.	1.00	350.00	\$350.00
08/05/2024	Heather Hunter	00415182: Forensics - Remote collection of phhames@earthlink.net email mailbox.	1.00	350.00	\$350.00
08/05/2024	Heather Hunter	00415182: Forensics - Stage email collection (phhames@earthlink.net) for ingestion.	0.50	350.00	\$175.00
08/05/2024	Jennifer Kovacs	00415182: Forensics - peer review of one (1) email account for P. Hames (phhames@earthlink.net).	0.25	350.00	\$87.50
08/06/2024	Heather Hunter	00415170: Forensics - Remote collection of 2 email mailboxes (michelle.abrego@utrgv.edu, mhabrego812@gmail.com).	2.00	350.00	\$700.00
08/07/2024	Heather Hunter	00415171: Forensics - Remote collection of kcarr7324@gmail.com email mailbox.	1.00	350.00	\$350.00
08/07/2024	Heather Hunter	00415191: Forensics - Remote collection of james.d.albers@gmail.com email mailbox.	1.00	350.00	\$350.00
08/07/2024	Heather Hunter	00413535: Forensics - Apply new date filter to S.Linebrink email collection.	0.50	350.00	\$175.00
08/07/2024	Ann Bransom	00415180: Forensics - Peer review of mailbox collection (H. Lewis)	0.25	350.00	\$87.50
08/07/2024	Ann Bransom	00415191: Forensics - Peer review of mailbox collection (J. Albers)	0.25	350.00	\$87.50
08/07/2024	Ann Bransom	00413535: Forensics - Peer review of mailbox collection (S. Linebrink)	0.25	350.00	\$87.50
08/07/2024	Patrick Nicholson	00415170: Forensics - Peer review of M. Abrego two (2) email collections.	0.25	350.00	\$87.50
08/07/2024	Ann Bransom	00415171: Forensics - Peer review of mailbox collection (K. Carr)	0.25	350.00	\$87.50
08/08/2024	Heather Hunter	00415187: Forensics - Remote collection of 2 email mailboxes (twcrofford@sbcglobal.net, theodrecrofford@gmail.com).	2.00	350.00	\$700.00
08/08/2024	Heather Hunter	00415184: Forensics - Remote collection of raykym@hotmail.com email mailbox.	1.00	350.00	\$350.00
08/08/2024	Heather Hunter	00415171: Forensics - Stage email collection (kcarr7324@gmail.com) for ingestion.	0.50	350.00	\$175.00
08/08/2024	Heather Hunter	00415180: Forensics - Stage email collection (hddiane@gmail.com) for ingestion.	0.50	350.00	\$175.00
08/08/2024	Heather Hunter	00415191: Forensics - Stage email collection (james.d.albers@gmail.com) for ingestion.	0.50	350.00	\$175.00
08/08/2024	Heather Hunter	00413535: Forensics - Stage email collection (slinebrink@watermission.org) for ingestion.	0.50	350.00	\$175.00
08/08/2024	Heather Hunter	00415170: Forensics - Stage 2 email collections (michelle.abrego@utrgv.edu, mhabrego812@gmail.com) for ingestion.	0.50	350.00	\$175.00
08/08/2024	Ann Bransom	00415187: Forensics - Peer review of mailbox collection (T. Crofford)	0.25	350.00	\$87.50
08/09/2024	Heather Hunter	00415183: Forensics - Remote collection of qandersoncpa@outlook.com email mailbox.	1.00	350.00	\$350.00

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Invoice #: 512029  
Date: 09/01/2024

DISCO Services					
Date	Resource	Description	Quantity	Price	Amount
08/09/2024	Heather Hunter	00415183: Forensics - Stage email collection (qandersoncpa@outlook.com) for ingestion.	0.50	350.00	\$175.00
08/09/2024	Heather Hunter	00415184: Forensics - Stage email collection (raykym@hotmail.com) for ingestion.	0.50	350.00	\$175.00
08/09/2024	Heather Hunter	00415187: Forensics - Stage 2 email collections (twcrofford@sbcglobal.net, theodorecrofford@gmail.com) for ingestion.	0.50	350.00	\$175.00
08/09/2024	Patrick Nicholson	00415184: Forensics - Peer review of R. Kym email collection.	0.25	350.00	\$87.50
08/09/2024	Patrick Nicholson	00415183: Forensics - Peer review of Q. Anderson mailbox collection.	0.25	350.00	\$87.50
08/14/2024	Heather Hunter	00415177: Forensics - Remote collection of sylvia@oikoschurch.org email mailbox.	1.00	350.00	\$350.00
08/14/2024	Kim Reed	Forensic Project Coordination - Scope & relay collection details for examiner; coordinate collection with custodians	0.50	350.00	\$175.00
08/14/2024	Heather Hunter	00415177: Forensics - Stage email collection (sylvia@oikoschurch.org) for ingestion.	0.50	350.00	\$175.00
08/15/2024	Jennifer Kovacs	00415177: Forensics - peer review of one (1) email account collection belonging to S. Schmidt (sylvia@oikoschurch.org).	0.25	350.00	\$87.50
08/16/2024	Heather Hunter	00420618: Forensics - Remote collection of bvoshage@aol.com email mailbox.	1.00	350.00	\$350.00
08/16/2024	Heather Hunter	00415172: Forensics - Remote collection of deb.rich@me.com email mailbox.	1.00	350.00	\$350.00
08/20/2024	Heather Hunter	00415172: Forensics - Stage email collections (deb.rich@me.com) for ingestion.	0.50	350.00	\$175.00
08/20/2024	Heather Hunter	00420618: Forensics - Stage email collection (bvoshage@aol.com) for ingestion.	0.50	350.00	\$175.00
08/22/2024	Jennifer Kovacs	00415172: Forensics - peer review of one (1) email account collection for D. Herczeg (deb.rich@me.com).	0.25	350.00	\$87.50
08/22/2024	Jennifer Kovacs	00420618: Forensics - peer review of one (1) email account collection for email belonging to B. Voshage (bvoshage@aol.com).	0.25	350.00	\$87.50
08/01/2024	Cheyenne Phillips	Create project tracker, distribution list, and foldering to facilitate effective project management	0.25	350.00	\$87.50
08/05/2024	Tracy Woodward	Analyze and consult with K. Esparza via email regarding search term scope.	0.25	350.00	\$87.50
08/05/2024	Cheyenne Phillips	Analyze and consult with K. Esparza via email regarding search term report	0.25	350.00	\$87.50
08/06/2024	Tracy Woodward	Analyze and consult with K. Esparza via phone regarding search terms and review workflow.	0.75	350.00	\$262.50
08/06/2024	Cheyenne Phillips	Summarize kickoff call and associated timelines for circulation to K. Esparza, A. Carrion, and D. Richards	0.25	350.00	\$87.50
08/19/2024	Cheyenne Phillips	Consult with K. Esparza via email regarding meeting to discuss search terms	0.25	350.00	\$87.50
08/20/2024	Stephen Crowder	Analyze and consult with D. Richards and case team via phone regarding document filtering and review workflow	1.00	350.00	\$350.00
08/02/2024	Anuj Jajoria	00416473: Remediate unsupported files and execute an image and text overlay for ingest session [289,321,353] along with remediation of PST container file and re-ingestion of same.	2.25	350.00	\$787.50

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 ar@cdisco.com

Invoice #: 512029  
 Date: 09/01/2024

DISCO Services					
Date	Resource	Description	Quantity	Price	Amount
08/03/2024	Vikash Kumar	00417074: Remediate unsupported files and execute an image overlay for ingest session 545, 513, 577 & 290. PST scan, PST repaired, PST recovered & PST Re-Ingested.	4.25	350.00	\$1,487.50
08/03/2024	Vikash Kumar	00417088: Remediate unsupported files and execute an image overlay for ingest session 259.	1.00	350.00	\$350.00
08/03/2024	Saurabh Dhir	00416817: Download data; stage and validate data for ingest as requested by K. Esparza; remediate exceptions and execute an exception and image overlay for ingest session [386]; review and analysis of ingested data to ensure accuracy.	1.00	350.00	\$350.00
08/03/2024	Abhishek Sharma	00417068: Remediate unsupported files and execute an image, text and exception metadata overlay for ingest session [481]; Exception remediation for partially processed pst.	0.75	350.00	\$262.50
08/03/2024	Abhishek Sharma	00417071: Remediate unsupported files and execute an image and exception metadata overlay for ingest session [130]	0.75	350.00	\$262.50
08/03/2024	Abhishek Sharma	00417081: Remediate unsupported files and execute an image, text and exceptions metadata overlay for ingest session [449]	0.75	350.00	\$262.50
08/03/2024	Abhishek Sharma	00417079: Remediate unsupported files and execute an image, text and exception metadata overlay for ingest session [417]	0.75	350.00	\$262.50
08/03/2024	Saurabh Dhir	00417082: Remediate unsupported files and execute an exception and image overlay for ingest session [641] as requested by M. Relf.	0.50	350.00	\$175.00
08/03/2024	Saurabh Dhir	00417087: Remediate unsupported files and execute an exception and image overlay for ingest session [194] as requested by M. Relf.	0.50	350.00	\$175.00
08/03/2024	Saurabh Dhir	00417086: Remediate unsupported files and execute an exception and image overlay for ingest session [226] as requested by M. Relf.	0.50	350.00	\$175.00
08/03/2024	Saurabh Dhir	00417080: Remediate unsupported files and execute an exception and image overlay for ingest session [609] as requested by M. Relf.	0.50	350.00	\$175.00
08/04/2024	Amanda De Leon	00417068: Reingested the recovered PST, monitored, quality checked, and released data for IngestSessions/705. Released all noted remediations for the original ingest session/481.	0.50	350.00	\$175.00
08/14/2024	Amanda De Leon	00420708: Staged, monitored, quality checked, and released data for IngestSessions/1121.	0.50	350.00	\$175.00
08/08/2024	Mohsin Shaikh	00419350 : Download data, stage and validate data for ingest as requested; review and analysis of ingested data to ensure accuracy.	0.50	350.00	\$175.00
08/01/2024	Morgan Vrooman	00415746: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	1.00	350.00	\$350.00
08/01/2024	Morgan Vrooman	00415748: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	1.00	350.00	\$350.00
08/01/2024	Morgan Vrooman	00415751: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.75	350.00	\$262.50
08/01/2024	Morgan Vrooman	00415745: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.50	350.00	\$175.00
08/08/2024	Morgan Vrooman	00419360: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.75	350.00	\$262.50
08/08/2024	Morgan Vrooman	00419358: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.75	350.00	\$262.50

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ar@csdisco.com

Invoice #: 512029  
Date: 09/01/2024

DISCO Services					
Date	Resource	Description	Quantity	Price	Amount
08/08/2024	Morgan Vrooman	00419352: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.75	350.00	\$262.50
08/08/2024	Morgan Vrooman	00419346: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.75	350.00	\$262.50
08/09/2024	Morgan Vrooman	00419594: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.75	350.00	\$262.50
08/09/2024	Morgan Vrooman	00419599: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.50	350.00	\$175.00
08/09/2024	Morgan Vrooman	00419596: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.50	350.00	\$175.00
08/20/2024	Morgan Vrooman	00421848: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.75	350.00	\$262.50
08/20/2024	Morgan Vrooman	00421847: Download data, stage and validate data for ingest. Review and analysis of ingested data to ensure accuracy.	0.50	350.00	\$175.00
08/05/2024	Tylor Austad	00417354: Download, stage and validate data for ingest session 737; Perform standard exception review	0.75	350.00	\$262.50
Subtotal					\$19,812.50

Tax	\$2,386.44
Total	\$38,541.50
Amount Paid / Credits Applied	(\$319.80)
AMOUNT DUE	\$38,221.70

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Invoice #: 528145  
Date: 10/01/2024

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Austin TX 78701  
United States

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Austin TX 78701  
United States

Invoice Amount Due:

\$2,835.23

Due Date: 10/31/2024

Review Database Name	Billing Code	PO Number
LCMS v. CTX	3803 - 008	

DISCO Ediscovery				Pro-Rated		
Start Date	End Date	Description	Size (GB)	Quantity	Price	Amount
09/01/2024	09/30/2024	0.01 GB HWM True Up for September	0.01	0.01	38.00	\$0.38
10/01/2024	10/31/2024	429.16 GB ECA Monthly for October	429.158	429.16	5.00	\$2,145.79
10/01/2024	10/31/2024	2.00 GB Active for October	2	2.00	38.00	\$76.00
Subtotal						\$2,222.17

DISCO Services					
Date	Resource	Description	Quantity	Price	Amount
09/17/2024	Cheyenne Phillips	Create and run search term report with requested date scope; folder hits per request of K. Esparza	0.50	350.00	\$175.00
09/17/2024	Stephen Crowder	Review and analysis of search term report to ensure accuracy as requested by K. Esparza	0.25	350.00	\$87.50
09/17/2024	Stephen Crowder	Analyze and consult with case team via email regarding search parameters	0.25	350.00	\$87.50
09/17/2024	Cheyenne Phillips	Analyze and consult with K. Esparza via email regarding filtering out documents based on date range	0.25	350.00	\$87.50
Subtotal					\$437.50

Tax	\$175.56
Total	\$2,835.23
Amount Paid / Credits Applied	(\$0.00)
AMOUNT DUE	\$2,835.23

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